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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR

Honorable Yvonne Gonzalez Rogers

**META AND STATE AGS' NOTICE OF
FILING OF (1) SUBSTANTIAL
COMPLETION AND (2) DEPOSITION-
RELATED DEADLINES APPLICABLE TO
PLAINTIFFS AND/OR STATE AGENCIES
IN STATE AG CASES**

Pursuant to the Court’s instruction at the January 17, 2025, Case Management Conference, Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, “Meta”) and the State Attorneys General (“State AGs”) provide the Court with the following lists of substantial completion and deposition-related deadlines applicable to Plaintiffs and the state agencies in the State AG cases:

- I. Substantial Completion Deadlines
- II. Deadlines for Meta to Serve Notices of Fact Depositions¹
- III. Deadlines to Meet and Confer re: Scheduling of Rule 30(b)(6) and Fact Depositions
- IV. Deadlines to File Discovery Letter Briefs re: Disputes Concerning Scheduling or Taking of Rule 30(b)(6) and Fact Depositions
- V. Deadlines to Complete Rule 30(b)(6) and Fact Depositions

I. Substantial Completion Deadlines (January 10-February 10)

- January 10 – All other State AGs and state agencies (not otherwise specifically identified on this list)
- January 14 – Nebraska (Governor)
- January 17 – Connecticut, Missouri
- January 22 – North Carolina (Governor and DPI)
- January 24 – Louisiana, North Carolina (DHHS)
- January 31 – Arizona, Illinois, Indiana, Kansas, Kentucky, Michigan, Minnesota, New York, Ohio, Washington, Wisconsin, Oregon (agreement by Parties), South Carolina (agreement by Parties), Virginia (agreement by Parties)

¹ On December 13, 2024, Meta timely served Rule 30(b)(6) notices to each of the States seeking State and state agency testimony. Certain disputes regarding those notices were briefed (ECF No. 1525) and the subject of argument at the January 2025 Discovery Management Conference, where Judge Kang directed Meta to serve amended notices on January 21, 2025.

- 1 • February 3 – California (CalHHS, DHCS, and MHSOAC),² Colorado, Delaware, South Dakota
- 2 (all agencies except DSS)
- 3 • February 7 – California (including the California executive agencies), Hawaii, Maine, Nebraska
- 4 (all other agencies, besides Governor), New Jersey, Pennsylvania, Rhode Island
- 5 • February 10 – South Dakota (DSS)

6 **II. Deadlines for Meta to Serve Notices of Fact Depositions (February 14-March 5)**

- 7 • February 14 – North Carolina
- 8 • February 21 – All other State AGs and state agencies (not otherwise specifically identified on
- 9 this list)
- 10 • March 5 – Rhode Island

11 **III. Deadlines to Meet and Confer re: Scheduling of Rule 30(b)(6) and Fact Depositions**

12 **(January 6-February 14)**

13 **A. 30(b)(6) Depositions**

- 14 • Deadlines began to pass on January 6, and have passed for all State AGs and state agencies other
- 15 than the below.
- 16 • February 3 – Washington

17 **B. Fact Depositions**

- 18 • February 14 – All State AGs and state agencies

19 **IV. Deadlines to file Discovery Letter Briefs re: Disputes Concerning Scheduling or Taking of**

20 **Rule 30(b)(6) and Fact Depositions (January 13-March 14)**

21 **A. 30(b)(6) Depositions**

- 22 • Deadlines began to pass on January 13, and have passed for all other State AGs and state
- 23 agencies other than the below.
- 24 • February 7 – Washington

27 ² The Mental Health Services Oversight and Accountability Commission (“MHSOAC”) is now known
 28 as the Behavioral Health Services Oversight and Accountability Commission (“BHSOAC”).

B. Fact Depositions

- February 21 – All other State AGs and state agencies other than the below.
- March 14 – North Carolina

V. Deadlines to Complete Rule 30(b)(6) and Fact Depositions (March 7-April 4)

A. Completion of 30(b)(6) Depositions

- March 7 – All other State AGs and agencies other than the below.
- March 14 – Indiana
- March 17 – Washington
- April 4 – Arizona, California, Colorado, Connecticut, Delaware, Hawaii, Illinois, Kansas, Michigan, Minnesota, Nebraska, Rhode Island

B. Completion of Fact Depositions

- April 4 – All State AGs and state agencies

1 DATED: January 21, 2025

Respectfully submitted,

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ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: January 21, 2025

By: /s/ Ashley M. Simonsen
Ashley M. Simonsen